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March 10, 2020

MEMO ENDORSED

The Honorable Edgardo Ramos United States District Judge United States District Court Southern District of New York Thurgood Marshall United States Courthouse 40 Foley Square New York, NY 10007 -Via ECF- USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC#____
DATE FILED: March 10, 2020

Re:

USA v. Jonathan Saldivar 19 Cr. 612 (ER)

Dear Judge Ramos,

Our office represents Mr. Jonathan Saldivar in the above referenced matter.

On July 31, 2019, Mr. Saldivar was released on a \$50,000.00 Personal Recognizance Bond, secured by two financially responsible persons. As part of his bail conditions, Mr. Saldivar has travel restricted to the Southern and Eastern Districts of New York, and the Eastern District of Pennsylvania, with Pretrial Supervision, among other conditions of release.

Mr. Saldivar's mother, Johanny Xiomara Sanchez Moya, has a few medical conditions for which the doctor recommends his presence for emotional support. (See doctor's letter attached)

Mr. Saldivar respectfully requests his conditions of release be modified to allow him to travel to the Dominican Republic to be with his mother for five (5) days, from April 2, 2020 to April 6, 2020. Also, the temporary return of his passport to be able to travel.

U.S. Pretrial Services Officer Marlon Ovalles takes no position to this request and reports that Mr. Saldivar remains in full compliance, has tested negative on all drug tests, and remains employed.

The government, by way of A.U.S.A. Juliana Murray, objects to these requests by the defendant.

Thank you for your consideration.

Respectfully-submitted,

Telesforo Del Valle, Jr., Esq.

Attorney for Defendant,

Jonathan Saldivar

Cc. A.U.S.A. Juliana Murray, Esq.

U.S. Pretrial Services Officer Marlon Ovalles

Mr. Saldivar's request for leave to travel internationally in April 2020 is DENIED. The Clerk of Court is respectfully directed to terminate the letter motion, Doc. 28.

It is SO ORDERED.

Edgardo Ramos, U.S.D.J.

March 10, 2020